

ROBERT ALLAN MUIR & ASSOCIATES, LLP.

Attorneys at Law
115 Broadway, 3rd Floor
New York, New York 10006

212-812-0694 • 718-875-2022 • FAX 212-732-3730

Robert Allan Muir, Jr.
Ilsa Beltran

Jeffrey T. Buley - *Of Counsel* (JTB 4873)

MEMO ENDORSED

October 25, 2005

The Honorable Kenneth M. Karas
United States District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 920
New York, New York 10007-1312

STATE OF NEW YORK
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/26/05

Re: Concepcion v. City of New York, et al 05 CV 8501 (KMK)

Dear Judge Karas:

The undersigned, together with Jeffrey Buley, Esq., represent the Republican National Committee ("RNC") in connection with the above referenced action. Said action was commenced in State Court and, upon information and belief, has been removed to the Southern District of New York pursuant to the filing of a Notice of Removal by co-defendant City of New York.

The RNC was served with plaintiff's complaint on or about October 5, 2005. The RNC has not filed its answer to the complaint. Mr. Buley has previously requested of plaintiff's attorney, Karen Wohlforth, Esq., an extension of time within which to answer or otherwise move, but she has consented to only a 10 day extension. In order to properly respond to the complaint, our client requires additional time to investigate its allegations and obtain such records and information as are available in the underlying criminal action against Plaintiff Jody Concepcion.

We are informed that Ms. Wohlforth has consented to affording the City of New York a 60 day extension. It is respectfully requested the Court grant the RNC a comparable period within which to answer or otherwise move with respect to the complaint, to wit: December 5, 2005. The foregoing request has not been previously made and is now made within defendant's answering time. If this meets with your approval, would your Honor kindly "so order" same?

Thanking the Court for its consideration, I am

Very truly yours,

Because the co-defendant already has been granted a 60-day extension, Defendant Republican National Committee is given 60 days to answer or otherwise respond to the complaint.

Robert Allan Muir, Jr. (RAM8003)

SO ORDERED

KENNETH M. KARAS U.S.D.J.

cc: Karen Wohlforth, Esq.
Jeffrey A. Dougherty, Esq. (JD 5224)
Jay A. Kranis, Senior Counsel (JK 2576)

10/25/05